EXHIBIT 15

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From: Katie Sullivan < Katie @ Streamline family of fice.com>

Sent: Thursday, January 18, 2018 6:19 PM

To: Steven Donziger <sdonziger@donzigerandassociates.com>

Cc: John Van Merk <jhvm@rossteq.com>; Ian Watson <iw@watsonassetmanagement.com>

Subject: Re: note the below -- Ecuador

Agenda looks like a great start! I look forward to seeing the budget so I can help secure funders and possible sponsors.

On Jan 18, 2018, at 4:57 PM, Steven Donziger < sdonziger@donzigerandassociates.com > wrote:

The below is a key part of our out-of-court strategy. Want to make sure you guys understand the plan. Being organized by Kathleen Mahoney, Phil's wife and a prominent law professor. I have high hopes for this. We need to raise more funds for it but it is getting off the ground. Let's talk soon.

From: Kathleen Elizabeth Mahoney kmahoney@ucalgary.ca

Sent: Thursday, January 18, 2018 12:16 AM

To: Steven Donziger; Sharon Mascher; Robert Hamilton; Kristen van de Biezenbos; Phil Fontaine

Subject: first draft of a conference program

Hi evervone

I am taking this opportunity to E-Introduce Steven Donziger and Phil Fontaine to Sharon Mascher, Robert Hamilton and Kristen van de Biezenbos, my colleagues at the University of Calgary who have volunteered to be in the "core" organizing group for the conference. Steven has been the long standing (long suffering) lawyer representing the Ecuadorian claimants and I think you all know who Phil is. Both Steven and Phil are very interested in the conference and will continue to play an active role going forward.

I have done a first draft outline of a conference program which is attached. Please bear in mind this is a FIRST DRAFT so please go at it with sharp pencils with your suggestions, comments, deletions, additions etc., or even don't hesitate to say we have to start over of you think that is necessary.

I have tried to incorporate the initial conference proposal document into the goals and objectives of the conference. From there I tried to reflect those goals and objectives into panels that may be of interest to an audience that would include indigenous persons and a wide variety of interdisciplinary participants in addition to the legal community. If we are successful is getting either Roger Waters or Margaret Atwood or both, we will have a sell out for sure. I have also tried to incorporate Sharon's suggestions for panels and speakers. I am attaching her suggestions FYI to this email.

In addition to the program we are working on venue options and clarifying availability at the Banff Springs. I am attaching a link if you want to have a look. So far they have quoted the best rates.

http://www.fairmont.com/banff-springs/?cmpid=google_bsh_search-brand-canada_branded-e-revsh&gclid=EAlalQobChMlp7CQ1NXg2AlVkmF-Ch3ScgCsEAAYASAAEgl3CvD_BwE

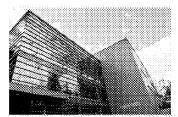


Luxury Banff Hotel & Resort - Fairmont Banff Springs Hotel www.fairmont.com

Experience our luxurious Banff Springs hotel and golf resort located in the Rocky Mountains of Banff National Park, Alberta, Canada. Enjoy our world-class golf course ...

I am also trying to get clarification from the Kinnear Centre for Creativity and Innovation about rates and availability. Here is ta link to their website. It would also be a good choice as they have a well developed Indigenous presence on faculty and in their programs.

https://www.banffcentre.ca/kinnear-centre-creativity-and-innovation



Kinnear Centre for Creativity and Innovation | Banff Centre www.banffcentre.ca

Banff Centre's newest meeting facility, the LEED Certified Kinnear Centre for Creativity and Innovation, includes 17 fully-equipped meeting rooms of varying sizes and ...

The McEwan Hall venue located on the campus of the University of Calgary is attached here. We are trying to get their info as well but they don't return phone calls (bad sign).

https://www.macewancentre.com/

think we should have another meeting soon to talk about this. Next week is not on for me but perhaps the week of the 29th. I am wide open except for Friday. Please let me know your availability. If you have comments on the FIRST DRAFT please provide them ahead of the meeting. Thanks !! I am now putting together a rough budget which we will need to discuss. Look forward to seeing or hearing from you soon. Best,

Kathleen Mahoney FRSC, QC Fellow of the Royal Society of Canada

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Trudeau Fellow Fulbright Fellow Sir Allen Sewell Fellow Barrister and Solicitor Professor of Law

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<Sharon's Conference PanelSpeaker suggestions[3].docx>

<Outline for Conference on Aquinda v Chevron case and related indigenous issues.docx>